

The Honorable Marsh J. Pechman

UNITED STATES DISTRICT COURT OF WASHINGTON  
AT WESTERN DISTRICT SEATTLE

JULIE DALESSIO, an individual,  
  
Plaintiff,  
  
v.  
  
UNIVERSITY OF WASHINGTON, et. al.  
  
Defendants.

No. 2:17-cv-00642 MJP

DEFENDANTS' PRIVILEGE LOG RE:  
DEFENDANT UW'S RESPONSES TO  
PLAINTIFF'S FIRST  
INTERROGATORIES AND  
REQUESTS FOR PRODUCTION

COME NOW DEFENDANTS, by and through counsel of record Special Assistant Attorney General Jayne L. Freeman and identify the following documents not produced in response to Plaintiff's first discovery requests pursuant to the following objections:

	No. of Pages	Date	Parties	Description	Privilege/Objection
1	20 pp	1-23-17	Kelly Harmon, AAG	Legal Research	Attorney/client & Work Product
2	2 pp	10-17-16	Gabriel Lungstom, Office Asst., AG Rob Kosin, AAG Michelle Doiron, AAG	Emails re call from Dalessio, Julie	Attorney/client
		10-18-16	Rob Kosin, AAG Eliza Saunders Nancy Garland, AAG		

3		1-11-17 1-13-17	Shari Spung, Risk Management/claims Rob Kosin, AAG Kelly Harmon, AAG	Email string re: Dalessio	Attorney/client Claims investigation privilege, RCW 4.92.210(2)
4	3 pp	4-13-17	Kelly Harmon, AAG Michelle Doiron, AAG	Email re: Dalessio (and containing above email string)	Attorney/client Work Product
5	3 pp	2-2-17	Kelly Harmon, AAG	Notes re: phone call with Shari Spung re: legal advice	Attorney/client Work Product
6		1-23-17	Kelly Harmon, AAG	Legal research	Attorney work product
7	4 pp	2003	Jeff Davis, former AAG	Unsigned copies of 2003 separation agreement & stipulation & order of dismissal of Personnel Appeals Board	Attorney work product
8	2 pp	undated	Shari Spung, Risk Management/claims	Notes to file re PRA analysis	Claims investigation privilege, RCW 4.92.210(2)
9	21 pp	11-10-16-4-10-17	Shari Spung, Risk Management/Claims	Notes re: Dalessio	Claims investigation privilege, RCW 4.92.210(2) Attorney/client
10	4 pp	undated	Shari Spung, Risk Management/claims	Copies of tort claim & lawsuit with risk management/claims investigation notes	Claims investigation privilege, RCW 4.92.210(2)
11	1p	2/14-2/15/17	Shari Spung, Risk Management/claims Andrew Palmer, OPR	Email strings re: Dalessio records request PR-2016-00760 and 10-21-16 tort claim by Dalessio	Claims investigation privilege, RCW 4.92.210(2)

12	1 pp	10-21-16	Thalita Baccarin, former Program Coordinator, Claim Services (on behalf of Shari Spung, Risk Management Claims) Kathleen Burns	Email strings re: Dalessio records request PR-2016-00760 and 10-21-16 tort claim by Dalessio	Claims investigation privilege, RCW 4.92.210(2)
13	2 pp	11/10/16-4/10/17	Shari Spung, Risk Management/claims	Risk Management/Claims notes	Claims investigation privilege, RCW 4.92.210(2)
14	4 pp	10/31/16	Karin Nyrop, AAG Shari Spung, Risk Management/claims	Email re tort claim	Attorney/client Claims investigation privilege, RCW 4.92.210(2)
15	5 pp	10/31-11/1/16	Shari Spung, Risk Management/claims Elizabeth Cherry, Risk Management/Claims	Email re tort claim source of funds	Claims investigation privilege, RCW 4.92.210(2)
16	2 pp	10/25/16	Claims Departmental Account Shari Spung, Risk Management/claims	Notice of claim closure	Claims investigation privilege, RCW 4.92.210(2)
17	4 pp	11/29/16	Shari Spung, RM/claims Eliza Saunders Perry Tapper Alison Swenson Nancy Garland, AAG Rob Kosin, AAG Norm Arkans, former Public Information Officer	Exec notification re new tort claim-confidential claims communication	Claims investigation privilege, RCW 4.92.210(2) Attorney/client
18	4 pp	11-29-16	Shari Spung, Risk Management/claims Kathleen Burns	New claim notification-confidential claims communication	Claims investigation privilege, RCW 4.92.210(2) Attorney/client
19	2 pp	11-29-16 12/11/16 12/4/16	Shari Spung, Risk Management/claims	Note to RM file re response from claimant	Claims investigation privilege, RCW 4.92.210(2) Attorney/client

20	1 pp	4/3/17	Shari Spung, Risk Management/claims Deb Austin, former RM Casey Leichter Karin Nyrop, AAG Nancy Garland, AAG Aileen Huang, Elizabeht Dahl Lansing Jones Michelle Doiron, AAG Mary Taylor Margaret Graves Esteve	New Lawsuit: Julie Dalessio v. UW	Claims investigation privilege, RCW 4.92.210(2)
21	8 pp	12/2/16	Shari Spung, Risk Management/claims Alison Swenson, OPR	Emails re AAG attorney/client email and claimant contact	Claims investigation privilege, RCW 4.92.210(2) Attorney/client
22	7 pp	12/5/16	Shari Spung, Risk Management/claims Alison Swenson, OPR	Dalessio-confidential claims communication	Claims investigation privilege, RCW 4.92.210(2)
23	7 pp	12/5/16	Shari Spung, Risk Management/claims Norm Arkans, OPR	Dalessio-confidential claims communication	Claims investigation privilege, RCW 4.92.210(2)
24	7 pp	12/5/16	Shari Spung, Risk Management/claims Eliza Saunders, OPR	Dalessio-confidential claims communication	Claims investigation privilege, RCW
25	7 pp	12/5/16	Shari Spung, Risk Management/claims Perry Tapper, OPR	Dalessio-confidential claims communication	Claims investigation privilege, RCW 4.92.210(2)

The foregoing objections were asserted in good faith pursuant to FRCP 26 and 33.

1 DATED: August 31, 2018

2 KEATING, BUCKLIN & McCORMACK, INC., P.S.

3  
4 By: /s/ Jayne L. Freeman  
5 Jayne L. Freeman, WSBA #24318  
6 Special Assistant Attorney General for Defendants

7 800 Fifth Avenue, Suite 4141  
8 Seattle, WA 98104-3175  
9 Phone: (206) 623-8861  
10 Fax: (206) 223-9423  
11 Email: jfreeman@kbmlawyers.com  
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**DECLARATION OF SERVICE**

I declare that on August 31, 2018, I caused a true and correct copy of the foregoing document to be served on the party listed below *via email*.

**Attorney for Plaintiff**

Mr. Joseph Thomas  
14625 S.E. 176<sup>th</sup> St., Apt. N-101  
Renton, WA 98058-8994  
(206)390-8848  
[joe@joethomas.org](mailto:joe@joethomas.org)

DATED: August 31, 2018

/s/ Tia Uy

Tia Uy, Legal Assistant

1 SUPPLEMENTAL RESPONSE:

2 The documents identified in the foregoing privilege log are responsive to  
3 Interrogatory No. 2.

4  
5 DATED: October 4, 2018

6 KEATING, BUCKLIN & McCORMACK, INC., P.S.

7  
8 By: /s/ Jayne L. Freeman

9 Jayne L. Freeman, WSBA #24318

10 Special Assistant Attorney General for Defendant

11 801 Second Avenue, Suite 1210

12 Seattle, WA 98104-1518

13 Phone: (206) 623-8861

14 Fax: (206) 223-9423

15 Email: jfreeman@kbmlawyers.com

**CERTIFICATE OF SERVICE**

I hereby certify that on October 4, 2018, I caused a true and correct copy of the foregoing document to be served on the party listed below *via email*:

**Attorneys for Plaintiff**

Mr. Joseph Thomas  
14625 SE 176th Street, Apt. N-101  
Renton, WA 98058-8994  
Telephone: (206) 390-8848  
Email: joe@joethomas.org

DATED: October 4, 2018

*/s/ LaHoma Walker*

LaHoma Walker, Legal Assistant